

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

No. 2:21-cv-022-Z

Plaintiffs,

Date: January 25, 2023

V. 8

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC., PLANNED  
PARENTHOOD GULF COAST, INC.,  
PLANNED PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED PARENTHOOD  
SOUTH TEXAS, INC., PLANNED  
PARENTHOOD CAMERON COUNTY,  
INC., PLANNED PARENTHOOD SAN  
ANTONIO, INC.,

## Defendants.

Date: January 2

**JOINT MOTION TO MODIFY PAGE LIMITS FOR BRIEFING AND REPLY  
DEADLINE AND REQUEST FOR EXPEDITED RELIEF**

The parties hereby move the Court for expedited relief to modify the page-limit requirements for briefing on their oppositions and replies to their respective dispositive motions and to modify the deadline for filing reply briefs. Per Local Rule 56.5, “the length of a principal brief must not exceed 50 pages and a reply brief must not exceed 25 pages.” N.D. Tex. L.R. 56.5(b). Furthermore, under Local Rule 7.1, oppositions to dispositive motions are due on January 27, 2023, and replies in support of any party’s dispositive motion are due on February 10, 2023. The parties have discussed and evaluated the most efficient way to present their arguments to the Court. As a result of those discussions, and consistent with Local Rule 56.5

and the page-limit modifications the Court previously approved for the parties' opening summary-judgment briefs [Dkt. 379], the parties jointly propose the following page limits for opposition and reply briefs:

- In opposition to PPFA and the Affiliate Defendants' motions for summary judgment, the State of Texas and Relator (collectively, "Plaintiffs") may file a joint response of up to 100 pages, or may file two separate responses of no more than 50 pages each, with joinder in the other response;
- In opposition to Plaintiffs' motions for summary judgment, Affiliate Defendants and PPFA may file a joint response of up to 100 pages, or may file two separate responses of no more than 50 pages each, with joinder in the other response;
- If Plaintiffs elect to file a reply in support of their motions for summary judgment, they may file a joint response of up to 50 pages, or may file two separate responses of no more than 25 pages each, with joinder in the other response;
- If PPFA and the Affiliate Defendants elect to file a reply in support of their motions for summary judgment, they may file a joint response of up to 50 pages, or may file two separate responses of no more than 25 pages each, with joinder in the other response.

In addition, because Relator's counsel currently has an oral argument in the Fifth Circuit the week of February 6, and because the Affiliate Defendants' counsel have a preexisting conflict on February 17, the parties respectfully request that the deadline for submitting all reply briefs be moved from February 10, 2023 to **February 21, 2023**.

For the foregoing reasons, the parties respectfully request that the Court adopt the modifications to the page limits and deadlines described herein.

Dated: January 25, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2023, a copy of the foregoing was served pursuant to the Court's ECF system.

*/s/ Danny S. Ashby*  
Danny S. Ashby